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RECENT IMPORTANT DECISIONS

ADMIRALTY—MEANING OF “SHORE.”—Certain sections of a dry dock containing a tug were driven by a violent storm across the Mobile River and left on the land above the ordinary high water mark. *Held*, subject to salvage, and a suit to recover for replacing the tug in the water within admiralty jurisdiction. *The Gulfport*, (Dist. Ct., S. D. Ala., 1917), 243 Fed. 676.

In the case of *The Ella*, 48 Fed. 569, the Court was confronted with an analogous situation and allowed salvage. But in that case the question of jurisdiction does not appear to have been raised. Salvage is due for assistance in dangerous situations at sea and for property preserved after having been cast on shore. *Waite v. The Antelope*, Fed. Cas. No. 17,045; *Cope v. Vallette Dry Dock Co.*, 119 U. S. 625. “Shore” is defined as that space between ordinary high and low water mark, *Shively v. Bowlby*, 152 U. S. 1; *Elliott v. Stewart*, 15 Ore. 259. In the instant case the violence of the storm assisted by a time-worn definition had apparently placed the tug beyond the jurisdiction of the admiralty court. But the court was equal to the situation and extended the “shore” to include land on which waters have deposited things which are the subject of salvage. This is in accord with the liberal doctrine of admiralty courts which look to the subject matter rather than to narrow rules and definitions.

ADOPTION—RIGHT OF INHERITANCE—SECOND ADOPTION.—The Comp. Laws, 1897, provide that on adoption the child shall become and be an heir at law of the adoptive parents. There was a second proceeding for the adoption of a child which was signed and assented to by the parties. *Held*, that it *ipso facto* revoked or superseded the first order of adoption of the child by other parties, and the child lost his right to inherit from his first adoptive parents. *In re Klapp's Estate*, (Mich., 1917), 164 N. W. 381.

The cases decide that unless the statute expressly provides otherwise, the adopted child will inherit from his natural parents as well as from his adoptive parents. *In re Walworth's Estate*, 85 Vt. 322; *Clarkson v. Hatton*, 143 Mo. 47; *Flannigan v. Howard*, 200 Ill. 396, 15 MICH. L. REV. 161. In *Patterson v. Browning*, 146 Ind. 160, the court held that the second adoption did not revoke the right of inheritance from the first adoptive parent on the ground that the adopted child according to the statute inherits as if it were a natural child. “At all events there is no reason why the second adoption should destroy the relation created by the first adoption and the legal capacity to inherit thereby created.” *Russell's Admin. v. Russell's Guardian*, 14 Ky. Law Rep. 236, was decided the same way but no reasons were given for the decision. In the instant case the court said that the second adoption having destroyed the rights and obligations of the prior adoptive parents, destroyed the reciprocal right of inheritance. It differentiates this result from that of inheriting from natural parents even though adopted. “In the one case, by no act of the parent, can he prevent the child becoming his heir.